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SEP 21 REC'D

**Subject:** Request for Concurrence on Suitability for Lease  
Building 933, Presidio of San Francisco

Dear Mr. Cooper:

The California Department of Toxic Substances Control (DTSC) has reviewed the initial DRAFT Request for Concurrence on Suitability for Lease dated September 1, 2006, and a revised Request for Concurrence on Suitability for Lease dated September 13, 2006. On September 7, 2006, DTSC provided verbal comments to the Trust and indicated that the attachments to the initial DRAFT request had not been included with the submittal. Subsequent to these discussions, the Trust revised the Request for Concurrence and submitted the required attachments. At the Request of the Trust, DTSC has provided an expedited review of the revised Request for Concurrence for Lease of Building 922, Presidio of San Francisco.

DTSC is hereby providing concurrence with the Trust's finding of suitability to lease Building 933, subject to the limitations and conditions presented below. A brief discussion of the project background is presented prior to a discussion of the conditions for concurrence.

**Project Background:** Building 933 is located within the Crissy Field remediation area of the Presidio and has been the subject of several remedial investigations and subsequent remedial actions. Recent investigations at Building 933 and adjacent buildings have indicated that low concentrations of several volatile organic compounds (VOCs) have been detected in soil beneath these buildings. At Building 937, adjacent to Building 933, VOCs have been detected in both the subslab and the indoor air at concentrations that exceed risk-based screening levels. Although subslab concentrations of VOCs detected at Building 933 appear to be lower than risk based screening levels, the proposed changes to the facility may alter soil vapor movement beneath the building and result in VOC vapors intruding into the building interior.

The Trust has indicated that future use of Building 933 will be associated with recreation-compatible activities, which include sports-related businesses, general visitor amenities, and retail specialties. At this time, a tenant/developer/operator is proposing to rehabilitate, reuse, and operate approximately 10,000 square feet of the historic Building 933 as a year-round children's swimming school.

The swimming school would include: two learn-to-swim specialized swimming pools with surrounding decks; reception area for scheduling, service and retail sales; rest room, locker room and shower facilities; viewing area; play area; office space; staff lounge; and pool equipment room. The primary use would be swimming lessons for young children.

The tenant is proposing to only occupy the central and southern portion of Building 933. The northern portion of the building closest to Building 937 would be retained by the Trust for future uses to be determined.

#### **Conditions for Project Concurrence:**

Of primary concern is the potential for exposure to VOCs subsequent to building renovation. To that extent the Trust may not allow occupancy of the building to occur until after indoor air sampling has shown that VOCs in the indoor air are below applicable risk-based screening levels. All leasing and contract agreements entered into by the Trust prior to the completion of environmental clearance are performed at the sole risk of the Presidio Trust.

Concurrence on the Suitability to Lease is also contingent upon the implementation of several mitigation measures which were also identified in the request for concurrence.

1. Construction Health & Safety (H&S) Plan: The Trust will require the tenant's construction contractor to prepare and implement a H&S Plan to ensure worker safety during construction. H&S protocols will be established for potential risks related to VOCs and other contaminants in soil at Building 933. The H&S Plan shall be submitted for DSTC review and will include monitoring of VOCs within the worker's breathing zone during removal of the concrete slab, excavation work, and during construction of the pools and any other work performed sub-grade or within the excavation.
2. Post-construction Indoor Air Monitoring: Following building construction/rehabilitation and prior to tenant occupancy, the indoor air of the building will be tested to ensure that PCE and other VOCs are not present in indoor air at levels which could pose a risk. After submitting a sampling and analysis plan for DTSC review and approval, the Trust will conduct two rounds of sampling: one round of sampling immediately following construction and prior to tenant occupancy. All results from the sampling and conclusions drawn from those results shall be submitted to DTSC for review and approval. If this initial sampling indicates that VOCs are not present at concentrations which pose a

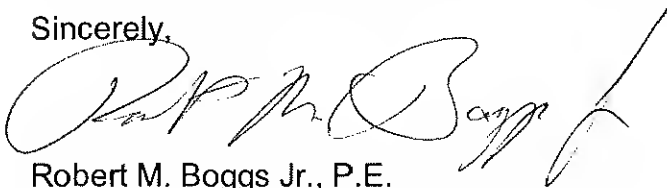
health risk, then tenant occupancy will be permitted, and a second round of sampling will occur approximately 6 months later.

3. Building 923/937 Land Use Control (LUC): In the addenda section of the Trust's recent deliverable to the DTSC entitled, Presidio Trust Land Use Controls Master Reference Report (EKI, 2006a), the Trust provided the LUC for the Building 923/937 Area, which includes Building 933. The LUC is designed to provide long-term protection of human health and the environment for residual contamination remaining in soil and groundwater in the area. The LUC will (1) restrict sensitive uses in outdoor areas of the site (there will be no restrictions on indoor use of the site for sensitive groups); (2) provide that the un-remediated areas around the building must remain covered with either buildings, pavement, or another barrier; (3) include soil handling, testing, reuse, and disposal requirements; (4) provide that all soil intrusive work in un-remediated areas be conducted under a site-specific H&S Plan; and (5) restrict use of groundwater at neighboring Building 937 as a drinking water or irrigation water supply.

In the request for concurrence, it was noted that the Trust previously requested closure certification for the Building 933/937 Area. During review of the information contained in the Implementation Report (EKI, 2004) it was noted that characterization of potential risks at these sites was inadequate, and that VOCs in soil vapor and indoor air could be of potential concern. At the request of DTSC, additional sampling was conducted and the results indicate the presence of VOCs at Building 937 in both the soil gas and indoor air at concentrations that are greater than the risk-based screening levels. Site certification can only be provided after the exposure risks at these sites are adequately mitigated.

If you have any questions or concerns regarding this concurrence letter or the conditions listed above please contact me at (510) 540-3751.

Sincerely,



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